

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JIMMY SCHLIER,	:
WRECKERS INTERNATIONAL, INC.	:
d/b/a SCHLIER TOWING &	:
SERVICE CENTER	:
Plaintiffs,	: No. 3:CV-04-1863
	:
v.	:
	:
CAPTAIN JOHN RICE, et al.	: (Judge Caputo)
Defendants,	: (Electronically Filed)

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

Defendants, by their attorney, Sarah C. Yerger, Senior Deputy Attorney General, request that prospective jurors be asked the following questions (and any appropriate follow-up questions, in the event that individuals give affirmative answers to initial questions):

1. Have you or anyone close to you ever worked for the Commonwealth of Pennsylvania, or for any other governmental body, in the past or currently?
2. Have you or anyone close to you ever served in the military or been in the field of law enforcement?
3. Have you or anyone close to you ever been arrested or prosecuted for any type of offense (whether by the Pennsylvania State Police or by any other law enforcement agency)? If so, explain the circumstances. Would that incident have any impact on your ability to render a fair and impartial verdict in this case?

4. Have you, or any member of your family or friends, ever had any problems, negative dealings or encounters with the PSP, the Office of Attorney General or any other law enforcement agency? If so, what was the problem or encounter and how was it resolved? Would that incident affect your ability to render a fair and impartial verdict in this case?

5. Some people believe that just because a suit has been brought, the defendant is probably liable for something. Do you agree with that?

6. Do you believe the fact that a lawsuit is filed means that the person filing the suit is entitled to relief?

7. Have you or anyone close to you had any education, training, or work experience in the field of human resources or personnel management?

8. Have you, or anyone close to you, ever been accused of discrimination or treating someone else unfairly on account of race, sex, age, ethnic background, religion, or disability?

9. Have you ever read or heard about a situation where you thought that a person who claimed to have been a victim of discrimination actually had no basis for making such a claim?

10. Have you ever been in a situation where you defended or spoke up for someone else who was accused of treating another person in an unfair or discriminatory manner?

11. Have you or anyone close to you had any experience or expertise in the towing, repair or motor carrier business?

12. Have you or anyone close to you been self employed or owned your own business? If so, did you ever feel that anyone took any action against you that caused your business to suffer economic harm?

13. Have you served on a jury before?

14. Have you ever been a party or a witness in a lawsuit?

Respectfully submitted,

THOMAS W. CORBETT, JR.
Attorney General

Office of Attorney General
15th Floor, Strawberry Square
Harrisburg, PA 17120
Phone: (717) 705-2503
Fax: (717) 772-4526
syenger@attorneygeneral.gov

By: *s/ Sarah C. Yerger*
SARAH C. YERGER
Senior Deputy Attorney General
Attorney ID 70357 ECF: Yes

AMY FOERSTER
Senior Deputy Attorney General

ROB HAWN
Assistant Counsel
Pennsylvania State Police

SUSAN J. FORNEY
Chief Deputy Attorney General
Chief, Civil Litigation Section

Date: February 29, 2008

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JIMMY SCHLIER,	:
WRECKERS INTERNATIONAL, INC.	:
d/b/a SCHLIER TOWING &	:
SERVICE CENTER	:
Plaintiffs,	: No. 3:CV-04-1863
	:
v.	:
	:
CAPTAIN JOHN RICE, et al.	: (Judge Caputo)
Defendants,	: (Electronically Filed)

CERTIFICATE OF SERVICE

I, SARAH C. YERGER, Senior Deputy Attorney General, hereby certify that on this date a copy of the foregoing was served electronically via filing in the Middle District's Electronic Case Filing System to the following:

*Cletus Lyman Esquire
Michael S. Fettner, Esquire
Michael T. Sweeney, Esquire
Lyman & Ash
1612 Latimer Street
Philadelphia, PA 19103*

s/Sarah C. Yerger
SARAH C. YERGER
Senior Deputy Attorney General

DATE: February 29, 2008